

ORIGINAL

THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GENOA COLOR TECHNOLOGIES, LTD.,)
)
Plaintiff,)
) Civil Action No. 07-CIV-6233 (PKC)
v.) (JHP)
)
MITSUBISHI ELECTRIC CORP.;) MOTION TO ADMIT COUNSEL *PRO*
MITSUBISHI ELECTRIC US HOLDINGS,) *HAC VICE*
INC.; MITSUBISHI ELECTRIC AND)
ELECTRONICS USA, INC.; MITSUBISHI)
DIGITAL ELECTRONICS AMERICA,)
INC.; SAMSUNG ELECTRONICS CO.,)
LTD.; SAMSUNG ELECTRONICS)
AMERICA, INC.)
)
Defendants.)
----- X

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, James E. Hough, a member in good standing of the bar of this Court, hereby move for an Order in the above matter allowing the admission *pro hac vice* of:

Nicole M. Smith
Morrison & Foerster
555 West Fifth Street, 35th Floor
Los Angeles, CA 90013-1024
Tel: (213) 892-5200
Fax: (213) 892-5454
nsmith@mofo.com

Ms. Smith is a member in good standing of the Bars of the States of California and Illinois.

There are no pending disciplinary proceedings against Nicole M. Smith in any State or Federal Court.

DEC 14 2007
DEC 14 2007

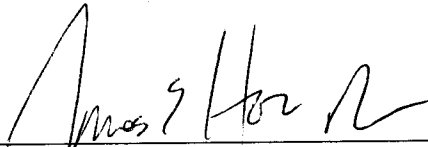
87-636148

In support of this motion and filed concurrently herewith is the Affidavit of James E. Hough in Support of Motion to Admit Counsel *Pro Hac Vice* and the Proposed Order for Admission *Pro Hac Vice* on Written Motion.

Dated: December 14, 2007

New York, New York

Respectfully submitted,

A handwritten signature in black ink, appearing to read "James E. Hough", written over a horizontal line.

James E. Hough, Esq. (JH-1066)
Morrison & Foerster
1290 Avenue of the Americas
New York, New York 10104-0050
Tel: (212) 468-8000
Fax: (212) 468-7900

THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GENOA COLOR TECHNOLOGIES, LTD.,)	
)	
Plaintiff,)	
)	Civil Action No. 07-CIV-6233 (PKC)
v.)	(JHP)
)	
MITSUBISHI ELECTRIC CORP.;)	AFFIDAVIT OF JAMES E. HOUGH IN
MITSUBISHI ELECTRIC US HOLDINGS,)	SUPPORT OF MOTION TO ADMIT
INC.; MITSUBISHI ELECTRIC AND)	COUNSEL <i>PRO HAC VICE</i>
ELECTRONICS USA, INC.; MITSUBISHI)	
DIGITAL ELECTRONICS AMERICA,)	
INC., SAMSUNG ELECTRONICS CO.,)	
LTD.; SAMSUNG ELECTRONICS)	
AMERICA, INC.)	
)	
Defendants.)	
-----	X	

James E. Hough, being duly sworn, hereby deposes and says as follows:

1. I am a member of Morrison & Foerster LLP, counsel for Defendants Mitsubishi Electric Corp., Mitsubishi Electric US Holdings, Inc., Mitsubishi Electric and Electronics USA, Inc.; Mitsubishi Digital Electronics America, Inc. (collectively, "Mitsubishi") in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Mitsubishi's motion to admit Nicole M. Smith as counsel *pro hac vice* to represent Mitsubishi in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in January 1987. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Ms. Smith is a member of Morrison & Foerster LLP, resident in our office in Los Angeles, California. She joined Morrison & Foerster in 2000 with a group of attorneys whom I have known and with whom I have worked since that time. I have known Ms. Smith personally since August of this year.

4. I understand Ms. Smith to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure. Attached hereto as Exhibit 1 is a Certificate of Good Standing from the Supreme Court of California for Nicole M. Smith. Attached hereto as Exhibit 2 is a Certificate of Good Standing from the Supreme Court of Illinois for Nicole M. Smith.

5. On August 20, 2007, Plaintiff's counsel, Lee A. Goldberg, was contacted to inform him of our intention to file motions for admission *pro hac vice* for several attorneys from Morrison & Foerster's Los Angeles office. Mr. Goldberg had no objection.

6. Accordingly, I am pleased to move the admission of Nicole M. Smith, *pro hac vice*.

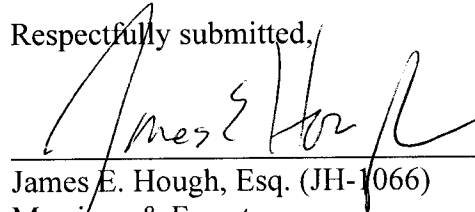
7. I respectfully submit a proposed order granting the admission of Nicole M. Smith, *pro hac vice*, which is attached hereto as Exhibit 3.

WHEREFORE it is respectfully requested that the motion to admit Nicole M. Smith, *pro hac vice*, to represent Plaintiff in the above captioned matter, be granted.

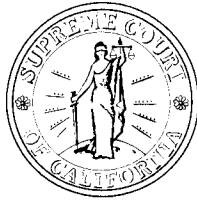
Dated: December 14, 2007

New York, New York

Respectfully submitted,

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James E. Hough, Esq. (JH-1066)
Morrison & Foerster
1290 Avenue of the Americas
New York, New York 10104-0050
Tel: (212) 468-8000
Fax: (212) 468-7900



Supreme Court of California

FREDERICK K. OHLRICH

Clerk of the Court

CERTIFICATE OF THE CLERK OF THE SUPREME COURT OF THE STATE OF CALIFORNIA

I, FREDERICK K. OHLRICH, *Clerk of the Supreme Court of the State of California*, do hereby certify that **Nicole Marie Smith** was on the **18th day of July 1997** duly admitted to practice as an attorney and counselor at law in all the courts of this state; and that her name now appears on the Roll of Attorneys as a member of the bar of this state in good standing.

*Witness my hand and the seal of the court,
this 11th day of December, 2007.*

FREDERICK K. OHLRICH

Clerk of the Supreme Court

By: _____

Jimmie Wright

Deputy Clerk

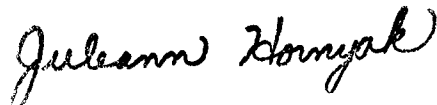
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Nicole M. Smith

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 10, 1994 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Friday, December 07, 2007.



Clerk

Nicole M. Smith is currently registered as an inactive attorney pursuant to Supreme Court Rule 756(a)(5), and "shall no longer be eligible to practice law" or hold herself out as being authorized to practice law in Illinois.